

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

IOENGINE, LLC,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 18-452 (WCB)
)	
PAYPAL HOLDINGS, INC.,)	
)	
Defendant.)	

**PAYPAL’S MOTION FOR SUMMARY JUDGMENT OF INVALIDITY AND
NONINFRINGEMENT BASED ON PRECLUSION**

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Defendant PayPal Holdings, Inc. (“PayPal”) hereby move the Court for an order granting summary judgment that claim 114 of U.S. Pat. 9,774,703 (the “703 patent”) and claim 10 of U.S. Pat. 9,059,969 (the “969 patent”) are invalid and that the accused readers supplied by Ingenico do not infringe those claims. The grounds for this motion are set forth in PayPal’s Opening Brief, filed herewith.

PayPal respectfully requests that the Court grant PayPal’s Motion and enter the accompanying [Proposed] Order.

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August 18, 2025

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PAYPAL HOLDINGS, INC.,)	
)	
Defendant.)	

[PROPOSED] ORDER

The Court, having considered Defendant PayPal Holdings, Inc.'s Motion for Summary Judgment of Invalidity and Noninfringement Based on Preclusion and all submissions related thereto, determines that there is no genuine dispute of material fact that (1) Claim 114 of U.S. Pat. 9,774,703 and claim 10 of U.S. Pat. 9,059,969 are invalid, and (2) Claim 114 of U.S. Pat. 9,774,703 and claim 10 of U.S. Pat. 9,059,969 are not infringed by the accused readers supplied to PayPal by Ingenico. Accordingly,

IT IS HEREBY ORDERED this ____ day of _____, 2025 that:

1. The Motion is Granted;
2. Claim 114 of U.S. Pat. 9,774,703 and claim 10 of U.S. Pat. 9,059,969 are invalid;
and
3. The accused readers supplied by Ingenico do not infringe claim 114 of U.S. Pat. 9,774,703 or claim 10 of U.S. Pat. 9,059,969.

William C. Bryson
United States Circuit Judge

CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using CM/ECF, which will send notification of such filing to all registered participants.

I further certify that I caused copies of the foregoing document to be served on August 18, 2025, upon the following in the manner indicated:

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